

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ZURICH AMERICAN INSURANCE
COMPANY,

Plaintiff,

v.

KNIGHTO, LLC d/b/a KNIGHT SOLUTIONS;
KNIGHT, LLC d/b/a KNIGHT SOLUTIONS
CONSTRUCTION; and KMC SOLUTIONS,
LLC,

Defendants.

Civil Action No. 1:17-cv-1412-LO-IDD

STIPULATION OF DISMISSAL WITHOUT PREJUDICE

It is hereby stipulated and agreed by and among plaintiff Zurich American Insurance Company ("ZAIC"), and defendants Knighto, LLC d/b/a Knight Solutions, Knight, LLC d/b/a Knight Solutions Construction, and KMC Solutions, LLC (collectively "Defendants") (all collectively as the "Parties") as follows:

(1) the Parties have reached a settlement that has been memorialized in a Settlement and Release Agreement with Stipulated Final Judgment (the "Agreement");

(2) the Parties agree that the United States District Court for the Eastern District of Virginia shall retain jurisdiction to enforce the terms of the Agreement;

(3) the Agreement provides, *inter ali*, that in the event of an uncured Default (as defined in the Agreement), ZAIC has the right to file a Stipulated Final Judgment (as defined in the Agreement); and

(4) as a result of the potential for a Default, the potential for the filing of a Stipulated Final Judgment and then judgment and enforcement proceedings, this action shall be

dismissed without prejudice pursuant to F.R.Civ.P. 41(a)(2).

Zurich American Insurance Company,
By its Attorneys,



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Knighto, LLC d/b/a Knight Solutions, Knight,
LLC d/b/a Knight Solutions Construction, and
KMC Solutions, LLC
By their President and CEO,



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APPROVED and SO ORDERED, this _____ day of _____, 2018.

The Court shall retain jurisdiction over the mater for purposes described above and to
adjudicate any dispute that might arise over the Agreement.

Liam O'Grady
United States District Judge